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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALEXANDER  
FRAWLEY IN SUPPORT OF  
PLAINTIFFS' MOTION TO EXCLUDE  
CERTAIN GOOGLE EMPLOYEE  
WITNESSES**

Judge: Hon. Yvonne Gonzalez Rogers  
Date: October 13, 2023  
Time: 9:00 a.m.

DECLARATION OF ALEXANDER FRAWLEY  
ISO PLAINTIFFS' MOTION TO EXCLUDE CERTAIN GOOGLE EMPLOYEE WITNESSES

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALEXANDER FRAWLEY**

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P., counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice *pro hac vice* before this Court. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in Support of Plaintiffs' Motion to Exclude Certain Google Employee Witnesses.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a draft trial witness list that Google sent to Plaintiffs on August 25, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Google's Second Amended Rule 26(a) Disclosures, served August 17, 2023.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiffs' Second Set of Interrogatories to Google, served February 26, 2021.

6. Attached hereto as **Exhibit 4** is a true and correct copy of Google's Response to Plaintiffs' Interrogatory No. 4, served March 29, 2021.

7. Attached hereto as **Exhibit 5** is a true and correct copy of Google's Initial Rule 26(a) Disclosures, served September 8, 2020.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a document Google produced on February 1, 2021, labeled GOOG-BRWN-00023909.

9. Attached hereto as **Exhibit 7** is a true and correct copy of Google's Supplemental Response to Plaintiffs' Interrogatory No. 4, served October 4, 2021.

10. Attached hereto as **Exhibit 8** is a true and correct copy of Google's Amended Rule 26(a) Disclosures, served February 21, 2022.

11. Attached hereto as **Exhibit 9** is a true and correct copy of a draft trial witness list that Plaintiffs sent to Google on September 1, 2023.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a Rule 30(b)(6) deposition notice that Plaintiffs served on March 4, 2022.

DECLARATION OF ALEXANDER FRAWLEY  
ISO PLAINTIFFS' MOTION TO EXCLUDE CERTAIN GOOGLE EMPLOYEE WITNESSES  
Case No. 4:20-cv-03664-YGR-SVK

15. Attached hereto as **Exhibit 13** is a true and correct copy of a letter sent from Plaintiffs' counsel to Google's counsel, dated March 1, 2021.

17. As shown in **Exhibit 14**, counsel for Google responded on August 31, 2023 to say that Google is “considering” that request.

18. As of this filing, counsel for Google has not yet followed up to provide further information about its position on the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 8th day of September, 2023, at New York, New York

/s/ Alexander Frawley

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